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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

SABRINA CLAPP and DENISE REDFIELD,
individually and on behalf of others similarly
situated,

Plaintiffs,

vs.

ALLY FINANCIAL INC.; ALPACA
SECURITIES LLC; CASH APP INVESTING
LLC; SQUARE INC.; DOUGH LLC;
MORGAN STANLEY SMITH BARNEY LLC,
E*TRADE SECURITIES LLC; E*TRADE
FINANCIAL CORPORATION; E*TRADE
FINANCIAL HOLDINGS, LLC; ETORO USA
SECURITIES, INC.; FREETRADE, LTD.;
INTERACTIVE BROKERS LLC; M1
FINANCE, LLC; OPEN TO THE PUBLIC
INVESTING, INC.; ROBINHOOD
FINANCIAL LLC; ROBINHOOD MARKETS,

Case No.: 3:21-cv-00896-LB

**JOINT STIPULATION TO EXTEND
DEADLINE TO MOVE OR
OTHERWISE RESPOND TO
PLAINTIFFS' COMPLAINT**

1 INC.; ROBINHOOD SECURITIES, LLC; IG
2 GROUP HOLDINGS PLC; TASTYWORKS,
3 INC.; TD AMERITRADE, INC.; THE
4 CHARLES SCHWAB CORPORATION;
5 CHARLES SCHWAB & CO. INC.; FF TRADE
6 REPUBLIC GROWTH, LLC; TRADING 212
7 LTD.; TRADING 212 UK LTD.; WEBULL
8 FINANCIAL LLC; FUMI HOLDINGS, INC.;
9 STASH FINANCIAL, INC.; BARCLAYS
10 BANK PLC; CITADEL ENTERPRISE
11 AMERICAS, LLC; CITADEL SECURITIES
12 LLC; MELVIN CAPITAL MANAGEMENT
13 LP; SEQUOIA CAPITAL OPERATIONS LLC;
14 APEX CLEARING CORPORATION; THE
15 DEPOSITORY TRUST & CLEARING
16 CORPORATION,

Defendants.

1 Plaintiffs Sabrina Clapp and Denise Redfield (“Plaintiffs”) and the undersigned Defendants
2 (together with Plaintiffs, the “Parties”), hereby stipulate and agree as follows:

3 WHEREAS, Plaintiffs filed a Complaint on February 4, 2021 (Dkt. No. 1);

4 WHEREAS, Defendants’ deadline to move or otherwise respond to the Complaint is
5 currently April 5, 2021;

6 WHEREAS, on February 5, 2021, the plaintiffs in *Cheng et al v. Ally Financial Inc. et al*, 21-
7 cv-00781 (N.D. Cal.), filed a Motion for Transfer of Actions to the Northern District of California
8 Pursuant to 28 U.S.C. § 1407 for Coordinated or Consolidated Pretrial Proceedings (“Motion”) with
9 the Judicial Panel on Multidistrict Litigation (“Panel”);

10 WHEREAS, on February 9, 2021, the Panel accepted the Motion for filing as *In re January*
11 *2021 Short Squeeze Trading Litigation* (MDL No. 2989) and ordered an accelerated briefing
12 schedule;

13 WHEREAS, on February 23, 2021, Charles Schwab & Co., Inc., TD Ameritrade, Inc., TD
14 Ameritrade Clearing, Inc., TD Ameritrade Holding Corporation and The Charles Schwab
15 Corporation filed a Notice of Potential Tag-Along Actions, identifying a number of additional cases,
16 including the instant action, as tag-along cases for the JPML to consider transferring to the proposed
17 multidistrict litigation (JPML Dkt. No. 66);

18 WHEREAS, a hearing on the Motion before the JPML is scheduled for March 25, 2021;

19 WHEREAS, the Parties want the action to proceed in an orderly and efficient manner;

20 WHEREAS, this is the first extension that has been requested and the Parties have not
21 obtained any previous extensions;

22 WHEREAS, Civil Local Rule 6-1 permits the Parties to “stipulate in writing, without a Court
23 order, to extend the time within which to answer or otherwise respond to the complaint” so long as
24 “the change will not alter the date of any event or any deadline already fixed by Court order”;

25 WHEREAS, the Parties have met and conferred and agreed to extend the deadline to move or
26 otherwise respond to the operative Complaint to April 30, 2021, or, if the transfer motion is granted,
27 until the date by which the transferee judge orders Defendants to move or otherwise respond to the
28 Complaint, whichever is later;

1 WHEREAS, Defendants do not waive, and expressly reserve, all available defenses and
2 challenges to jurisdiction; and

3 WHEREAS, such a stipulated extension would be without prejudice to Plaintiffs.

4 NOW THEREFORE, the Parties stipulate that:

- 5 1. Defendants' deadline to move or otherwise respond to the operative Complaint shall
6 be extended to April 30, 2021, or, if the transfer motion is granted, until the date by
7 which the transferee judge orders Defendants to move or otherwise respond to the
8 Complaint, whichever is later.
- 9 2. The Parties may stipulate to a further extension of time to move or otherwise respond
10 to the operative Complaint in this action.
- 11 3. Nothing herein shall prevent Defendants from moving for additional time to move or
12 otherwise respond to the operative Complaint.

1 Dated: March 8, 2021

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17 *Counsel for Apex Clearing Corp.*

ATTESTATION

I, C. Brandon Wisoff, am the ECF User whose identification and password are being used to file this Stipulation. In compliance with Local Rule 5-1(i)(3), I attest that concurrence in the filing in this document was obtained from the above signatories.

Dated: March 8, 2021

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